



**Horsham
District
Council**

████████████████████
Southwater Parish Council
Beeson House,
26 Lintot Square,
Fairbank Road,
Southwater,
West Sussex,
RH13 9LA

Our ref: SNP/Reg 16

Your ref: n/a

Date: July 2019

By Email.

Dear ██████████,

Re: Representation to Southwater Submission Neighbourhood Plan (Sept 2018)

Thank you for consulting Horsham District Council on the Southwater Submission Neighbourhood Plan and presenting an opportunity for further comment on the plan. The following are officer's comments.

We would wish to highlight the following key points since the Regulation 14 consultation. The Pre-Submission Draft Southwater Neighbourhood Plan has undergone an informal healthcheck' with HDC officers, with the expectation amendments will be implemented to ensure general conformity with planning legislation. This will bring reassurance to the examiner that the plan has been positively prepared, and every endeavor has been made to ensure the plan is in general conformity with national planning policy which as you are aware is one of the key Basic Conditions by which the Neighbourhood Plan will be assessed against. I attach a copy of the healthcheck for the examiner's perusal which will provide valuable context and will demonstrate the evolution of the emerging plan.

Southwater is identified as a 'small town and larger villages' group in the settlement hierarchy by Policy 3 of the adopted Horsham District Planning Framework (HDPF). It is therefore acknowledged as one of the district's most sustainable settlements it is able to accommodate new development of an appropriate scale and location. The emerging neighbourhood plan should acknowledge this point.

There is an expectation in the adopted Horsham District Planning Framework that in addition to any sites allocated specifically in the adopted HDPF, emerging neighbourhood plans will be required to accommodate an appropriate proportion of the minimum 1,500 dwellings to be delivered from Neighbourhood Plans across Horsham district as stated in Policy 15 (4) of the HDPF. The Council welcomes the fact that the emerging neighbourhood plan is proposing to make new housing allocations to count towards this requirement.

Horsham District Council broadly supports the scale of development set out in the neighbourhood plan at this point in time and in principle, welcomes the delivery of between 422 and 450 dwellings and accompanying infrastructure as an important contribution towards the 1,500 housing requirement to be delivered through neighbourhood plans.

Mindful of the quantum of development proposed in the emerging neighbourhood plan however, it is clear that there will be wider implications for the highway network and travel beyond the parish boundary of allocating this scale of development. HDC considers that a Strategic Transport Assessment is therefore a key piece of evidence currently missing from the plan's evidence base. In the absence of such assessment, there is a clear risk that the plan in its current form, will be found unsound. HDC notes WSCC have since withdrawn their objection with regards to the issue of the Strategic Transport Assessment and a provisional agreement has been reached between County Highways and the developer on an agreed methodology.

It is further noted the Parish Council has include commentary within the emerging neighbourhood plan to confirm that a full or partial review of the neighbourhood plan will need to be undertaken within an appropriate timeframe following the District Council's review of the Local Plan (the HDPF). It is considered the district Council's Local Plan Review will need to consider the potential role Southwater may play in meeting the strategic housing and other development requirements of Horsham District beyond 2031. This will reassure the Examiner that the neighbourhood plan has been positively prepared and every endeavour has been made to ensure the plan is in general conformity with national planning policy.

The emerging Southwater Neighbourhood Plan proposes several parcels of land as potential Local Green Spaces (LGS). Horsham District Council supports the principle of Local Green Space designations. However, it is acknowledged that a strict criterion must be satisfied before formal designation and there is the potential that the proposal put forward by the local community will not meet the requirements stipulated by Paragraph 100 of the National Planning Policy Framework. For information, we have provided this advice to the community, and have also explained that an examiner of the plan will also consider the site to ensure the LGS proposal meets the requirements set out by national planning policy and may ultimately recommend alterations or deletion of the site to ensure the plan meets the basic conditions.

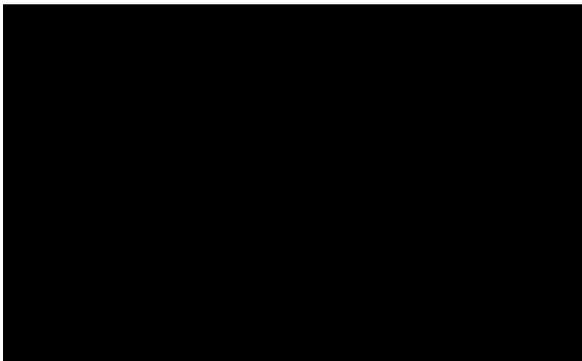
The Council also notes that the Southwater Neighbourhood Plan includes a review of the existing Built Up Area Boundary (BUAB) around the settlement. The review appears to have taken place applying and expanding upon the methodology set out through the Council's recent Local Plan Review Issue and Options (April 2018). However, as the Local Plan Review is in its infancy and is not adopted Council policy, little weight can be attributed to it at this time. BUABs around settlements are a well-established planning policy tool and are intended to provide a clear and readily understood indication of where development would or would not, be allowed in principle. Within BUABs there is a presumption that infilling, redevelopment and changes of use will be acceptable subject to other policies of the plan. The establishment of BUABs is therefore an important and well-established strategic policy mechanism in the adopted HDPF with significant development implications. In this context, other than where the emerging neighbourhood plan is specifically seeking to allocate new development, the Council is of the

view that revision of BUABs is a strategic matter which should be dealt with through the Local Plan Review.

Mindful of the Council's key comments and the extent of detailed comments set out in the subsequent table, the Council would strongly welcome the opportunity to work more closely with the Parish Council to progress the plan to the next stage and examination.

If you have any further questions regarding this representation or any of the comments submitted by Horsham District Council officers, please do not hesitate to contact me.

Yours sincerely,



**Horsham District Council Comments to the Pre-Submission
November 2018 Southwater**

NP Paragraph No/ Policy No.	Suggested Change / Comment	Reason for comment
General	<p>Replace reference to 'Proposals Map' with 'Policies Map' as this is the terminology used in planning legislation. The Policies Map shows allocations and designations arising from policies in the local plan or Neighbourhood plan and at the current time these are not sufficiently clear. The Policies Map should be a map which:</p> <ul style="list-style-type: none"> (i) identifies the location and boundaries of allocations and designations; (ii) is reproduced from, or based on, an Ordnance Survey map; (iii) shows National Grid lines and reference numbers; and (iv) includes an explanation of any symbol or notation which it uses. <p>It follows all policies relating to landuse should be delineated on the policies map – proposed local green spaces, proposed buffer zones, designated play spaces and any proposed cycling or pedestrian links.</p>	To accord with legislation .
General	It is advised the Southwater Neighbourhood Plan document is given paragraph numbers to ensure referencing is made relatively simple for decision makers when writing reports and undertaking appeals. Policy criterion should be numbered throughout the plan. This is applied inconsistently throughout the plan.	For clarification and efficiency. (completed)

NP Paragraph No/ Policy No.	Suggested Change / Comment	Reason for comment
General – Introduction (Page 3)	There are several references to the plan period extending beyond 2033. This exceeds the HDPF plan period and would be in conflict with the basic conditions.	To meet the basic conditions (completed)
General Comment	Denne Hill is one of the significant cultural landmarks in Horsham and is popular with families during the winter season for tobogganing. Reference should be made in the Neighbourhood Plan to this.	To reflect local heritage
General – How this document should be used (page 5)	Reference is made to the following statement: <i>‘Whether or not the proposed development requires planning permission every proposing development within the parish should pay attention to and adhere to the aspirations and objectives set within this document’</i> . The NP or HDC have no control over development which does not require planning permission. Whilst everyone should have regard to the aspirations and objectives we have no power to make them adhere to them, and stating that in my view sets an expectation that cannot be achieved.	For clarification regarding the limitations of the planning system and to manage expectations.
Community Infrastructure (page 8)	<p>Page 8 refers to listed buildings. It would be suggested that the third and fourth paragraph are reconsidered as they appear to suggest that the only listed buildings in the Parish are restricted to timber framed 13th and 16th open hall houses and 16th and 18th century chimney houses. Christs Hospital for example is also listed but is not an open hall house or chimney house and was built in 1902.</p> <p>Page 8 Community Infrastructure – there are four schools within the Parish – Christs Hospital has not been included.</p>	For clarification and the purpose of accuracy.
Industry and Commercial/Business Park (page 10)	Page 10 Last paragraph, Southwater can’t be defined as a market town as it has no market.	For clarification and the purpose of accuracy.
SNP1 – SOUTHWATER’S CORE PRINCIPLES	Policy SNP1 is considered to be too prescriptive and could potentially preclude sustainable development to be delivered.	To ensure conformity with the basic conditions. (noted)

NP Paragraph No/ Policy No.	Suggested Change / Comment	Reason for comment
	<p><u>Criterion 1</u></p> <p>Any development site with the capacity to accommodate above 10 units and is located away from Lintot Square would not meet the 15 min walk radius as stipulated in the Policy. This is would contrary to the presumption of sustainable development and would not meet the basic conditions. The Policy does not take into account development including minor employment (equestrian/related agriculture) in the countryside beyond the settlement boundary.</p> <p>Furthermore, to quantify a 15 minute (to be delineated on the Policies Map) walking radius is open to conjecture given walking strides of different groups/demographic can be measured differently. The wording used for 1(b) is considered too onerous (it is recommended it is replaced with words such as ‘should seek to’ or ‘encourage’)</p> <p>1(b) appears seems to contradict criterion 1(a) as it suggests access could also be made by cycle or bus which would extend the extent of the potential opportunities away from Lintot Square.</p> <p><u>Criterion 2</u></p> <p>The methodology for the Settlement boundary review must be consistency applied. Limited weight can only be applied to the Council Issues and Options Review and the methodology used for the BUAB review has yet to be robustly examined.</p>	

NP Paragraph No/ Policy No.	Suggested Change / Comment	Reason for comment
	<p><u>Criterion 4</u></p> <p>Planning obligations (infrastructure provision) must meet the tests as stipulated in the NPPF. New development cannot address existing shortfalls.</p> <p><u>Criterion 6 and 7</u></p> <p>It is inevitable all new development will impact on the natural environment to an extent. Therefore, the presumption of sustainable development should also be integral to the decision making process.</p> <p><u>Criterion 9</u></p> <p>Planning contributions must meet the tests outlined in the NPPF and it must be acknowledged it is not always possible to deliver infrastructure improvements on land the developer does not control.</p>	
<p>SNP2 – ALLOCATION FOR RESIDENTIAL DEVELOPMENT</p>	<p>Supporting text on page 13 states SNP2 will deliver a minimum of 422 but Policy states a range between 422 and 450. For the purposes of positive planning it is suggested the policy should state a <i>'minimum of 422 of which at least 72 dwellings falling in Use Class C2'</i>.</p> <p>Given Southwater's status as one of the district's most sustainable settlements there is an acknowledgement that the Council's Local Plan Review next year will need to consider the potential role Southwater may play in meeting the strategic housing and other development requirements of Horsham District beyond 2031. It follows that Policy SNP2 should be modified to reflect Southwater's role in the forthcoming Local Plan Review. The design, layout and implementation of SNP2 should not prejudice any further future</p>	<p>To ensure conformity with the basic conditions.</p>

NP Paragraph No/ Policy No.	Suggested Change / Comment	Reason for comment
	<p>expansion of Southwater, should be considered appropriate. This should also be made explicit in Policy SNP2.</p> <p>It is also advised a reference is made for a requirement for Affordable Housing in the policy for clarification in accordance with the policies in the development plan.</p> <p><u>Criterion 1</u></p> <p>It may be required to remove parts of hedgerow or tree belts in order to achieve satisfactory access and bring forward the site comprehensively. However, broad support is given to the retention and enhancement of hedgerows, field patterns and tree belts where possible. This broad support for the retention of significant landscape features should be reflected in the policy which will offer the greatest flexibility to deliver a sympathetic development for Southwater.</p> <p><u>Criterion 2</u></p> <p>It should be acknowledged the developer may not have control of land to implement such infrastructure upgrades. Therefore, it is suggested further amendment to this criterion is made to offer a degree of flexibility.</p> <p><u>Criterion 3</u></p> <p>It is considered this criterion is too inflexible. Pedestrian and cycle routes should follow clear desire lines and be led by good design principles to ensure ease of movement, take account of gradient and practicality. Reference is made to a 15 min walking zone (which conflicts with cyclists which ordinarily is expected to cover greater</p>	

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	<p>distances on a cycle) and is not always practical to judge when measured against different walking groups users such as the young, the elderly or mobility impaired.</p> <p><u>Criterion 4</u></p> <p>Criterion 4 is considered to be too prescriptive and goes on to state: <i>“No category A, B, or C trees should be removed for the purposes of accommodating development. Only trees which are unsafe and represent a health and safety risk may be removed”</i>. This no doubt refers to the tree categorisation set out within Table 1 of BS 5837 'Trees in relation to design, demolition, and construction - Recommendations' (2012), The Council supports the retention of trees in a quantified and structured way. Category ‘U’ trees (those that should ideally be removed irrespective of the proposed development plans) are rightfully excluded. However, under Table 1, category ‘C’ trees are defined as <i>“trees of low quality”</i>, implying that they should not be seen as a material impediment to the planning process, and under the definition given would additionally not normally meet the criteria for formal protection under a TPO. Including such trees under a policy would possibly sterilise almost all development, and is considered too rigid.</p> <p>Category ‘A’ and ‘B’ trees should certainly be considered to be material to the planning process; it might be that some or all of these on sites are protected by TPO. It should be noted a planning permission legally overrides a TPO, and this is primarily because despite such trees being material to the planning process, the consideration as to whether category ‘A’ and or ‘B’ trees should be permitted to be removed to facilitate development on a site is part of the Council’s overall consideration of the scheme, in terms of whether to grant PP or not, taking all matters into account.</p>	

NP Paragraph No/ Policy No.	Suggested Change / Comment	Reason for comment
	<p>As part of the process of determination of applications for planning permission, local planning authorities have a statutory duty to give consideration to the retention (or otherwise) of trees under S.197 of the Town & Country Planning Act 1990. Nonetheless, it is considered Criterion 4 of Policy SNP2 is superfluous, unenforceable and should be removed.</p> <p><u>Criterion 5</u></p> <p>Criterion 5 is considered to be too prescriptive and inflexible which does not allow for high quality innovative design. The new 2018 NPPF is a material consideration and this plan should be in general conformity with national guidance with the emphasis on promoting and supporting strong innovative design solutions.</p> <p><u>Criterion 6</u></p> <p>The statutory development plan should be read in its entirety. It can be argued that Criterion 6 does not bring any added value to the policy. It is recommended this should be inserted in the supporting text.</p> <p><u>Criterion 7</u></p> <p>All new development would be required to assess the impact of the development on the setting of the Grade 2* listed Great House Farmhouse. It is not considered that a specified distance would be appropriate in this instance as the impact of the development would need to be considered in the context of the proposed development. The remaining field patterns and openness of the farm landscape all contribute to the appreciation of the historic farmstead and the significance of the listed building. A landscape</p>	

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	<p>buffer depending on its management or layout may in itself impact on the listed buildings setting. Notwithstanding a buffer zone would have to be delineated on a Policies Map. It would therefore be more appropriate to require any new development to maintain or enhance the setting of the listed building. The allocated land abuts Ancient Woodland to the west and a 15m buffer is also a requirement.</p> <p><u>Criterion 8</u></p> <p>The requirement for land safeguarded for education purposes is required to be supported by the local education authority.</p> <p><u>Criterion 9</u></p> <p>Paragraph 109 of the NPPF 2018 cites '<i>development should only be refused/prevented on the 'unacceptable impact' on highway safety or the residual cumulative impacts on the road network would be severe</i>'. It follows this criterion should be evaluated against the context of a comprehensive transport assessment in accordance with Paragraph 111 of the NPPF 2018. Such an assessment should not prejudice any further consideration of Southwater as part of the HDC's Local Plan Review.</p>	

NP Paragraph No/ Policy No.	Suggested Change / Comment	Reason for comment
SNP3 – SAFEGUARDING OF LAND FOR SECONDARY SCHOOL	<p>HDC broadly support the principle of safeguarding land for the school and the requirement to demonstrate existing schools have capacity if this safeguarding is to fall away. Nevertheless, it is considered the strict criterion imposed by SNP3 is impractical 25min walking, 15min cycle and 10min bus travel criteria is impractical and too inflexible.</p> <p>It is advised the education authority should be consulted on this matter and if their recommendation stipulate the educational needs of Southwater are met elsewhere there should be flexibility in the policy to allow for this possible eventuality. The education authority should not be bound by Policy SNP3 when they assess how the future needs of Southwater should be met.</p> <p>It is noted reference is made to both 2030 and 2033 in the policy which appear to conflict with each other. Furthermore, 2033 is beyond the current HDPF plan period (2031) and should be amended to be in general conformity with the HDPF.</p>	To reflect recent policy changes to ensure conformity with basic conditions.
SNP4 – KEEPING OUR ROADS MOVING	<p>SNP4 applies only to ‘major’ development proposals. Please quantify ‘major’? The presumption is 10 or more dwellings would constitute major development.</p> <p>Paragraph 32 of the NPPF 2012 states</p> <p><i>‘All developments that generate significant amounts of movement should be supported by a Transport Statement or Transport Assessment. Plans and decisions should take account of whether:</i></p> <ul style="list-style-type: none"> • <i>the opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure;</i> 	Objection. To ensure conformity with the basic conditions.

NP Paragraph No/ Policy No.	Suggested Change / Comment	Reason for comment
	<ul style="list-style-type: none"> • <i>safe and suitable access to the site can be achieved for all people; and</i> • <i>improvements can be undertaken within the transport network that cost effectively limit the significant impacts of the development. Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.'</i> <p>It follows a comprehensive strategic transport assessment would be required to justify the proposed quantum of development in the Neighbourhood Plan on the local and wider strategic network. It is also advised the views of the Local highways authority should also be taken into account.</p> <p>The plan will not meet the basic condition until such direct or cumulative impacts can be quantified and the level of intervention or mitigation required that would make the development acceptable in planning terms is clear.</p> <p>Regarding interventions, enhancements or planning contributions to support transport mitigation it is advised the policy is modified as follows or similar to that effect: <i>'Transport contributions towards infrastructure to support development will be secured by planning obligation or by condition attached to the planning consent or by any other appropriate mechanism such as a development tariff'</i>. This will cover both S106 and CIL.</p>	
SNP5 – LOCAL GREEN SPACE	It is expected all proposed Local Green Spaces must meet <u>all</u> the stringent tests set by Paragraph 77 of NPPF 2012 and subsequently Paragraph 100 of the revised NPPF 2018 respectively.	Objection. To ensure the policy meets the basic conditions.

NP Paragraph No/ Policy No.	Suggested Change / Comment	Reason for comment
	<p>Local Green Space designation should not be used as a vehicle to block development. The Planning Practice Guidance is explicit on this matter. The PPG states as follows:</p> <p><i>‘Designating any Local Green Space will need to be consistent with local planning for sustainable development in the area. In particular, plans must identify sufficient land in suitable locations to meet identified development needs and the Local Green Space designation should not be used in a way that undermines this aim of plan making.</i></p> <p><i>Paragraph: 007 Reference ID: 37-007-20140306’</i></p> <p>It is not appropriate to proposed to designate Local Green Space status if a site has a lawful planning permission attached to it or there is ‘live’ planning application about to be determined on it:</p> <p><i>‘Local Green Space designation will rarely be appropriate where the land has planning permission for development. Exceptions could be where the development would be compatible with the reasons for designation or where planning permission is no longer capable of being implemented.</i></p> <p><i>Paragraph: 008 Reference ID: 37-008-20140306’</i></p> <p>The neighbourhood planners must evaluate if a local green space designation warrants additional protection if land is already given strong protection through another policy designation and additional LGS status would be superfluous and unnecessary:</p> <p><i>‘Different types of designations are intended to achieve different purposes. If land is already protected by designation, then</i></p>	

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	<p><i>consideration should be given to whether any additional local benefit would be gained by designation as Local Green Space.</i></p> <p><i>Paragraph: 011 Reference ID: 37-011-20140306'</i></p> <p>Finally, the PPG advises local neighbourhood plan groups should contact landowners during the plan making process regarding designating land as Local Green Space:</p> <p><i>'A Local Green Space does not need to be in public ownership. However, the local planning authority (in the case of local plan making) or the qualifying body (in the case of neighbourhood plan making) should contact landowners at an early stage about proposals to designate any part of their land as Local Green Space. Landowners will have opportunities to make representations in respect of proposals in a draft plan.</i></p> <p><i>Paragraph: 019 Reference ID: 37-019-20140306'</i></p> <p>Therefore, HDC objects as the local landowner to the allocation of the following sites under the ownership of HDC. There has been no contact with HDC as a land owner to discuss this allocation and it is consideration of the Council that such proposals do not meet the stringent tests as set by Paragraph 77 of the NPPF. It is considered there are existing policy protections in place and LGS status would not bring any further benefit. Guidance is explicit on this matter as highlighted above and no such attempts have been made regarding meaningful contact. The sites we are objecting to are as follows:-</p> <ol style="list-style-type: none"> 1. Cedar Drive Open Space 2. Swan Close (or we have it as Camelot Close) Open space 3. Part of land at Edinburgh Close play area 4. Part of land at Woodlands Way 	

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SNP6 – LOCAL COMMUNITY SPACE	<p><u>Criterion 1</u></p> <p>The identification of public spaces which failed to meet the stringent LGS test have been put forward as a secondary designation ‘Local Community Space’. This designation does carry not have the same weight as Local Green Space which is a formal designation put forward by the NPPF but should be considered a local designation which carries limited weight.</p> <p><u>Criterion 2</u></p> <p>With regards the second criterion of the policy, it’s not clear what ‘small scale utility infrastructure’ is and this should be define but nevertheless utility providers have statutory powers to access land and carry out necessary works under the various Acts (water, electricity and gas). Therefore, it questioned if the second paragraph can be enforced.</p>	To meet the basic conditions
SNP7 – FORMAL/INFORMAL SPORTS AREAS	<p>HDC is broadly supportive of Policy SNP7 however further clarification is sought on the following:</p> <p>a) Sports pitches and spaces are already protected in the HDPF (Policy 43) and in national guidance and legislation (NPPF 2012 para 74 and NPPF 2018 para 97 respectively). School open spaces such as Castlewood Primary School playing fields are already protected under section 77 of the 1998 School Standards and Framework Act. Does this policy bring added value?</p> <p>b) Please define what is meant by ‘exceptional circumstances’?</p>	Clarification is sought.
SNP8 – SOUTHWATER COUNTRY PARK	Southwater Country Park is a popular community park. HDC broadly support Policy SNP8 but considers the following criterion as being overly prescriptive and will prevent appropriate development coming	Clarification is sought.

NP Paragraph No/ Policy No.	Suggested Change / Comment	Reason for comment
	<p>forward in a positive manner to improve the amenity value of the park:</p> <p><u>Criterion 1</u></p> <p>Clarification is sought on what defined as ‘small in scale’ is? It is recommended this wording is replaced by the word ‘sympathetic’, which will allow the greatest amount of flexibility to proposals coming forward such as the possible expansion to the café. It is recommended this criterion should be amended to read ‘<i>no significant harm</i>’ to existing flora and fauna. It is considered this is overly prescriptive, does not allow for any mitigation and cannot be monitored or enforced. Such a policy directive would potentially limit opportunities for planned expansion of facilities in the park.</p> <p><u>Criterion 2</u></p> <p>It is considered Criterion 2 (a-d) does not constitute positive planning and is overly prescriptive, too inflexible and should be modified to reflect a more positive approach. The NPPF 2012 (para 14) states for the purposes of plan making: ‘<i>local planning authorities should positively seek opportunities to meet the development needs of their area</i>’ This is made more explicit in the recent NPPF 2018 (para 11): ‘<i>plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change</i>’.</p>	
SNP9 – LIFETIME HOME STANDARDS	<p>It is acknowledged Lifetime Home Standard relating to accessibility and adaptable dwellings has moved across to Building Regulations. It is compulsory to meet Building Regulation M4(1) Visitable Dwellings. Local authorities can consider requiring the optional Building Regulations: M4(2) Accessible and adaptable dwellings, and / or M4(3) Wheelchair user dwellings. Where a local planning authority</p>	<p>Further evidence is required to ensure viability is not compromised.</p>

NP Paragraph No/ Policy No.	Suggested Change / Comment	Reason for comment
	<p>adopts a policy to provide enhanced accessibility or adaptability they should do so only by reference to Requirement M4(2) and / or M4(3) of the optional requirements in the Building Regulations. They should clearly state in their Local Plan what proportion of new dwellings should comply with the requirements. Part M of the Building Regulations sets a distinction between wheelchair accessible (a home readily useable by a wheelchair user at the point of completion) and wheelchair adaptable (a home that can be easily adapted to meet the needs of a household including wheelchair users) dwellings.</p> <p>It follows further evidence including viability is required to support Policy SNP9 which seeks standards over and above those set in national policy and as stipulated under Part M of the Building Regulations is required.</p>	
SNP10 – RESIDENTIAL SPACE STANDARDS	<p>Reference is made to the Technical Housing Standards (March 2015). It should be noted this is optional. It is not a building regulation and remains solely within the planning system as a new form of technical planning standard. The standard deals with internal space within new dwellings. It sets out minimum requirements for the Gross Internal (floor) Area of new dwellings at a defined level of occupancy as well as floor areas and dimensions for key parts of the home, notably bedrooms, storage and floor to ceiling height. There is no reference to outdoor space standard and this requirement should be removed without up to date evidence to justify local need.</p> <p>The optional regulations and space standard can only be applied where based on evidenced local need and where the viability of development is not compromised.</p>	Further evidence needed to implement optional space standard.
SNP11 – SPECIALIST ACCOMMODATION & CARE	HDC broadly support Policy SNP11 providing compelling evidence supports the delivery of C2 care accommodation in Southwater to support an aging population.	For accuracy.

NP Paragraph No/ Policy No.	Suggested Change / Comment	Reason for comment
	<p>It not is clear if care accommodation of 10 or more dwellings would be required to adhere to the SNP1 (1a). The Councils considers each application for C2 should be assessed on its own merits with the presumption of sustainable development in mind.</p> <p>It is advised a condition would secure the C2 use not through an s106 agreement as stipulated in the policy.</p>	
Page 21	Page 21 Typo – fig. 7 and 8 show the same photo.	Comment
SNP12 – OUTDOOR PLAY SPACE	<p>Please clarify what is defined as ‘major’ development?</p> <p>Providing play space on every site is not always possible however onsite provision can be secured through a legal agreement. Nevertheless, planning obligations must only be sought where they meet all of the following tests:</p> <ul style="list-style-type: none"> a) necessary to make the development acceptable in planning terms; b) directly related to the development; and c) fairly and reasonably related in scale and kind to the development. <p>Alternatively, the provision of play areas can also delivered via CIL monies. Parishes with a made neighbourhood plans can claim up to 25% of all CIL receipts generated from development within the parish. The provision of play areas can be delivered through CIL receipts.</p> <p>Support is given to play areas being well managed.</p>	Clarification sought
SNP13 – GROWING OUR CYCLING & WALKING NETWORK	There is broad support to develop and enhance cycling and pedestrian infrastructure within Southwater.	Modifications sought.

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	<p>Cycle and pedestrian routes which offer directness, access and connections, attractiveness and convenience are broadly supported but in certain circumstances the available to cross land under private control may not be possible. It is recommended the Policy is amended to reflect this.</p> <p>The planning process cannot be used to make a right of way formal. This is a different legal process. Development cannot solely be refused on grounds of the perceived negative visual and amenity impacts derived from a Public Right of Way.</p>	
<p>SNP14 – ADEQUATE PROVISION OF CAR PARKING</p>	<p>Views from WSCC should be sought as the Highway Authority.</p> <p>Is it considered Policy SNP14 is too onerous which may impact on viability of development and bring about an inflexibility/rigidity of site layouts which does not make best, most efficient use of land. It is noted SNP14 only relates to residential parking standards and does not provide guidance on non-residential uses. A deviation away from WS County Standards should be supported by <u>evidence which is clear and compelling</u> and be in accordance with national guidance giving priority to pedestrian and cycle movements.</p> <p>Paragraph 109 (NPPF 2018) for the purposes of determination of planning applications and is a material consideration states: <i>‘Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe’.</i></p> <p><u>Criterion 1</u></p> <p>Policy SNP1 (1) appears to advocate the expectation a 1 bed flat to have two parking spaces with no consideration for flatted</p>	<p>To ensure compliance with the basic conditions.</p>

NP Paragraph No/ Policy No.	Suggested Change / Comment	Reason for comment
	<p>development or sites near alternative nodes of transport such a bus stop or cycleway. Potentially a high level of car parking provision could swamp development with significant amount of parking which will be significantly detrimental to the overall design of the development. Such a high level of parking will also impact on the viability of schemes and not make the best, most efficient use of land.</p> <p>There should be consideration of terraces and flats. The Policy appears only seems to consider detached/semi-detached dwellings Please define layby parking? Potentially such land may be outside the control of the applicant? There may be safety implications for the installation of layby parking or further detriment to the streetscene if it results in loss of verges.</p> <p>Additional spaces per bedrooms (and upstairs studies) is considered too prescriptive and unreasonable.</p> <p><u>Criterion 2</u></p> <p>This might not always be feasible to deliver this on constrained sites.</p> <p><u>Criterion 3</u></p> <p>This criterion is considered to be too prescriptive and should be assessed on a case by case basis on individual merits.</p> <p><u>Criterion 4</u></p> <p>How would this be rounded up or down?</p>	

NP Paragraph No/ Policy No.	Suggested Change / Comment	Reason for comment
SNP15 – DRIVING IN THE 21ST CENTURY	<p>HDC broadly support Policy SNP15. Support is given to the promotion of residential charging points in all new development and is based on the strategy to reduce emissions in the district as a whole. Horsham District currently have two air quality management areas in the district – in Storrington and Cowfold; both declared for exceedances of annual mean nitrogen dioxide levels. Additional traffic derived from new development will increase emissions not just in Southwater but also other parts of the district. Planning has a significant role in air quality mitigation and effective planning policies can ensure we encourage air quality improvements.</p> <p>Reference is made to the supporting text on p27 (4th Paragraph). It is consideration of HDC that current technology and economies of scale will allow for electric charging points to be installed in new development which will not impact on viability of development coming forward. A residential home charger unit should cost circa *£750 per home charger unit, with a reduction in cost per unit if there are several being installed at the same time in the same premises as they will share the earth and electrical infrastructure costs. This cost refers to the installation being undertaken in an existing house. The cost for developers installing home chargers during the build phase will be much lower. Installing a charging point at the construction phase will therefore save time and effort to retrospectively implementing it later. It is recommended Policy SNP15 and the accompanying supporting text is modified to reflect this.</p> <p>*This figure was provided by the company 'Charge your Car' which installs and maintains HDC public electric charge points.</p>	Support is given to Policy SNP15
SNP16 – DESIGN	HDC is broadly supportive of Policy SNP13 and have the following comments:	General comments. Modifications sought. To meet the basic conditions

NP Paragraph No/ Policy No.	Suggested Change / Comment	Reason for comment
	<p>6. The requirement for details of bin stores/cycle stores is not necessarily a detail required prior to determination and could result in non-validation of application.</p> <p>7. Support is given to improving public realm but it should be acknowledged some signage can be erected without permission. Satellite dishes come under PD rights for example. HDC welcomes a coordinate approach with external bodies such as Highways to scale back/rationalise excessive signage where possible. Reference is also made to para 43 (NPPF 2012) stipulating telecommunications infrastructure should be sympathetically designed and camouflaged where appropriate.</p> <p>8. The criterion should quantify a distinction between built up areas and the open countryside. Excessive light pollution on intrinsically dark landscape, local amenity and nature conservation should be limited and where possible mitigated. (NPPF 2012 para 125/NPPF para180 (c)).</p>	
SNP17 – SITE LEVELS	<p>It is considered Policy SNP17 is too prescriptive. Most level issues can be dealt with through engineering and appropriate landscaping, and it will be for the case officer to manage this on a case by case basis.</p> <p>Criterion 3 to require applications for an extension to submit levels as <i>metres above ordnance datum</i> may be too onerous considering that household applications may not carry out a topographical survey. In this case meters above existing ground should be sufficient to determine the application.</p>	To meet the basic conditions
SNP18 – A TREED LANDSCAPE	<p>The Council considers SNP18 to be unreasonable and cannot support the policy as it currently stands. The initial paragraph of this policy refers to the preferred resistance to “<i>loss or damage</i>” to any woodland in the parish. This makes no provision in regard to the quantification of the differing qualities of woodland in the parish, and though it is noted that what is referred to are ‘development</p>	Objection. Modifications are sought in order for the policy to meet the basic conditions.

NP Paragraph No/ Policy No.	Suggested Change / Comment	Reason for comment
	<p>proposals' it makes no reference to forestry activities, where large areas of woodland may be harvested under the 1967 Forestry Act (as amended), this action taking place (hopefully) further to a felling license granted by the Forestry Commission.</p> <p>The assessment of a wooded area is a material matter in the overall consideration of material points in respect of a submitted planning application. It is within the Council's existing statutory duty to take trees and woodlands into proper account through the development process.</p> <p>It should noted that the principle of alternative site mitigation and compensation in regard to ancient woodland and ancient or veteran trees is already set out at para. 175 of the NPPF.</p> <p>While the principle of replanting trees with suitable stock is supported, the proposals put forward in terms of "<i>standard 8-10cm girth</i>" is again over prescriptive, as this might not be possible to implement this on all types of development and sites.</p> <p>The second criterion states that applications close to, or within, areas of ancient woodland "<i>should be determined in accordance with</i>" the NPPF. This is what the local planning authority is statutorily required to do in any case.</p> <p>It is considered the third criterion is overly-prescriptive and would be prohibitively expensive; potentially impact on viability and no evidence to justify such a measure.</p>	
SNP19 – PARISH HERITAGE ASSETS	Historic England have set out a best practice guide to defining a heritage asset which goes beyond the criterion used by the Parish council. These include;	Modifications are sought in order for the policy to meet the basic conditions.

NP Paragraph No/ Policy No.	Suggested Change / Comment	Reason for comment
	<p><u>Age</u> The age of an asset may be an important criterion, and the age range can be adjusted to take into account distinctive local characteristics or building traditions.</p> <p><u>Rarity</u> Appropriate for all assets, as judged against local characteristics</p> <p><u>Aesthetic Interest</u> The intrinsic design value of an asset relating to local styles, materials or any other distinctive local characteristics.</p> <p><u>Group Value</u> Groupings of assets with a clear visual design or historic relationship.</p> <p><u>Archaeological Interest</u> The local heritage asset may provide evidence about past human activity in the locality, which may be archaeological – that is in the form of buried remains – but may also be revealed in the structure of buildings or in a manmade landscape. Heritage assets with archaeological interest are the primary source of evidence about the substance and evolution of places, and of the people and cultures that made them.</p> <p><u>Archival Interest</u> The significance of a local heritage asset of any kind may be enhanced by a significant contemporary or historic written record. Historical Association The significance of a local heritage asset of any kind may be enhanced by a significant historical association of local or national note, including links to important local figures. Blue Plaque and other similar schemes may be relevant.</p> <p><u>Designed Landscape Interest</u> The interest attached to locally important historic designed landscapes, parks and gardens which may relate to their design or social history. This may complement a local green space designation, which provides special protection against development for green areas of particular importance to local communities for their current use.</p> <p><u>Landmark Status</u> An asset with strong communal or historical associations, or because it has especially striking aesthetic value, may be singled out as a landmark within the local scene.</p>	

NP Paragraph No/ Policy No.	Suggested Change / Comment	Reason for comment
	<p><u>Social and Communal Value</u> Relating to places perceived as a source of local identity, distinctiveness, social interaction and coherence, sometimes residing in intangible aspects of heritage, contributing to the 'collective memory' of a place.</p> <p>The criteria used within the Review of Heritage Assets document require an asset to be special to the local community, hold a particular historic significance and be irreplaceable in its historic nature OR be a Building /feature that is significant in maintaining and /or enhancing the setting of key aspects of the Parish.</p> <p>It is considered that the review criteria needs to be examined further so that the proposed assets fully meet the definition of a heritage asset as defined in the NPPF. The assessment criteria carries subjective judgements which do not take into consideration such issues as current planning approvals for example the Christs Hospital Goods Yard, (the building has an extant permission to be converted into 7 affordable rent units). No consideration has been given within the review to explore how the changes to the building would impact on its heritage interest following its subdivision and conversion (NPPF 2012 Paragraph 129).</p> <p>The modern sculpture of Iggy the Dinosaur, the 2008 war memorial and the Village Signs may have significant importance to the public realm, but would be unlikely to be meet the definition of a heritage asset as set out within the NPPF.</p> <p>They may best be catered for through the provision of a comprehensive design policy that specifically encompasses the public realm as noted above. In conclusion, therefore it is considered that the assessment criteria should be amended to ensure that the proposed assets are judged in line with the definition of heritage</p>	

NP Paragraph No/ Policy No.	Suggested Change / Comment	Reason for comment
	assets within the NPPF, and each asset re-evaluated to ensure they are heritage rather than purely community assets.	
SNP20 – RETENTION OF ASSETS OF COMMUNITY VALUE	<p>HDC advises it would be of benefit to list the Assets of Community Value attributed to Policy SNP20. Under the legislation the owner of an asset of community value must inform the local authority if they wish to sell the asset. If a group wants to buy the asset, they can trigger a moratorium for six months, to give them a chance to raise the money to purchase the asset. The owner does not have to sell to a community group. The asset of community value listing only improves the chances of community groups being able to purchase by providing more time to raise funds. It does not require the owner to sell at a discount.</p> <p>As ACV status is a material consideration in the determination of planning applications it would be expedient to quantify the term ‘benefit’ for the purposes of clarification as the policy implies.</p> <p>It follows Policy SNP20 should be aligned with the legislation (Localism Act 2012) regarding status of Assets of Community Value.</p>	Comment
SNP21 – A GROWING ECONOMY	<p>SNP21 does not consider rural economy or business outside the BUAB. Policy SNP21 references HDPF Policy 9 but should also take into consideration Policy 9 which considers the rural economy especially the second half of the policy which considers employment development outside the KEA and Parish Employment Areas only within the BUAB and on previously development or “unused land”. This is considered to be too prescriptive and each proposal should be assessed on its own merits against the presumption.</p> <p>SNP21 states it should be should be in general conformity with HDPF Policy 9. This should be replaced with the wording ‘development plan’ as the HDPF is currently under review and emerging policies will</p>	Objection. Modifications are sought in order for the policy to meet the basic conditions.

NP Paragraph No/ Policy No.	Suggested Change / Comment	Reason for comment
	<p>supersede existing HDPF policies. What weight is afforded to 'Parish Employment Area' over and above existing HDPF designations?</p> <p>Development proposals within KDA and Parish Employment Areas Regarding 'proposed alternative uses' as stipulated in Criterion (2) it appears to advocate alternative uses. If the intention is to allow for alternative uses where a unit has been vacant for some time and the amount of investment needed to bring it back into a commercial use is not viable, then the criterion needs to be more explicit.</p>	
<p>SNP22 – TELECOMMUNICATIONS</p>	<p>Broad support is given for the implementation of high quality communications infrastructure in accordance with National Planning Policy. However, Telecommunications Infrastructure can be applied for under Prior Approval. It would be expedient to define what is meant by telecommunication infrastructure as it can include sub-stations and telephone masts. Nevertheless, HDC supports the intention of the plan to make provision for full fibre connection <u>up to the curtilage on land in which the developer controls</u> enabling connection with the wider network.</p> <p>FTTP should not be restricted to residential and commercial but applies to all buildings such as schools, healthcare centre and community centres which all should have access to high speed fibre connection.</p>	<p>Comment. The policy should be modified to reflect this.</p>
<p>SNP23 – USE OF COMMUNITY INFRASTRUCTURE LEVY FUNDS</p>	<p>HDC is broadly supportive of Policy SNP23. The Southwater IDP should be included as part of the evidence base to support the emerging SNP and updated regularly.</p>	<p>Comment.</p>

NP Paragraph No/ Policy No.	Suggested Change / Comment	Reason for comment
<p>Background Evidence Site Assessment Evidence (General Comments)</p>	<p>In the site assessments document, on HDC's site at Foxes Close, it is suggesting that they do not think the land should be developed as it is 'mainly laid to grass' and is used as open space/amenity land. This is absolutely not the case. The land is completely inaccessible as it is overgrown. The assessments does say that the land is appropriate for 'infill development'.</p> <p>The site assessment for Site 4K, a working farm, identifies the site as brownfield but not contaminated. This does not reflect the potential issues associated with agricultural buildings and practices which have become heavily industrialised since the early 1950s. While it is correct that the area has not been determined as contaminated land for the purposes of part IIa of the Environmental Protection Act, this is based on the suitability for current use. The change of use that would occur if the site were allocated for residential development would require land contamination to be considered at the outset and will influence the viability of the development.</p> <p>With respect to noise and air quality again there appears to be mixed response to the significance of noise impacts in the site assessments. For example Sites 1, 4L,7, 14 and 15 borders the A24 or Worthing Road but are not identified as having any local noise or Air Quality issues.</p>	<p>General comments.</p>
<p>Background Evidence Southwater Landscape Sensitivity & Capacity Study</p>	<p>Page 11 – LDA Description, refers to this area as including a nature reserve. The only local nature reserve in the district is the Warnham Nature reserve.</p>	<p>General Comment</p>

NP Paragraph No/ Policy No.	Suggested Change / Comment	Reason for comment
	<p>Public Open Spaces in Southwater</p> <p>There are concerns with the weight applied to designations of ‘local community space’ and ‘formal/informal sports areas’ it will be for the examiner find that these meet the basic conditions.</p> <p>The assessment criteria/methodology for the two designations above does not clarify is these are all sites under the control of the parish or if like the local green space these do not need to be in public ownership or publicly accessible to be designated?</p> <p>As with the LGS designation, consideration must be given to other protective designations on site and what additional benefit the local community space or informal sports area designations would offer.</p> <p>Finally, the PPG states landowners should be contacted/consulted at the start of the LGS designation process. Has this been carried out?</p> <p>Page 9 – ref 2 <i>Denne Park – Toboggan run</i> – Appreciate that this type of site is unlikely to be available in the urban context and closer to the community but the site is not particularly within easy walking distance and thus meeting criteria 1 is questioned.</p> <p>Page 10 - ref 3 <i>Chesworth Farm Nature Reserve</i>, Chesworth Farm has not been declared formally as a nature reserve and does not enjoy of the designation.</p> <p>Page 12 – ref 5 <i>Playing fields off Colstaple Lane (1)</i>. Assessment criteria 1. refers to the close proximity of Horsham and serving this community. Is this correct? How is the site accessed? It doesn’t seem to be within reasonable walking distance of Southwater given the A24 or Horsham.</p>	<p>General Comments.</p>

NP Paragraph No/ Policy No.	Suggested Change / Comment	Reason for comment
	<p>Page 18 – ref 10 <i>Larkspur Way Open Space</i>. The methodology refers to consultation responses to ascertain how ‘demonstrably special to a community a space is. How does ref 9 sits within the responses as the space seems that could meet the criteria for a local green space and is reported as actively used by the community including children? Is this not the case as for ref 11 Cedar Drive?</p> <p>Page 19 – ref 12 <i>Butterfly Garden</i> Comments as above.</p> <p>Page 22 – ref 15 <i>Castlewood Primary School Playing Fields</i> This space is protect under different legislation. Is there further value in providing further protection.</p> <p>Page 26 – ref 19 <i>Junior Academy Playing fields</i> Comments as above</p> <p>Page 35 – ref 28 <i>Woodlands Way Open Space 3</i> There is a group of trees protected by TPO within this area. It is queried if this could not trigger criteria 2 as these trees by definition of the TPO are of outstanding quality or provide high quality value to the amenity of the area and thus locally significant?</p> <p>Page 38 – ref 31 <i>Bax Castle Gardens</i> The use of this space is presumably intrinsically linked to the beer garden. Should the pub ceases its use would this space still be considered demonstrably special to the community? Also queried if this is within the reasonable walking distance criteria?</p>	

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	<p>Page 39 – ref 32 <i>Cemetery</i> The justification as to criteria 2 seems incomplete. This must be substantiated for the robustness of the evidence.</p> <p>Page 41 – ref 34 <i>Christs Hospital green space</i> It has recreational value, its well-used by the community and contains TPOs which contribute to the amenity of the area.</p> <p>Page 42 – ref 35 <i>Land north of Christ Hospital</i> In the context of the settlement, would these two fields to be an extensive tract of land.</p> <p>Page 44 – ref 37 <i>Christs Hospital NW playing fields</i> This space is protected under legislation.</p> <p>Page 45 – ref 38 <i>Christs Hospital NE playing fields</i> There is a live application on this site (DC/18/1268) to accommodate amongst other things an athletic track, running trail, car park, etc.</p> <p>Page 46 – ref 39 <i>Christs Hospital Southern playing fields</i> Criteria 4 refers to the use of the PRoW which doesn't reflect the use of the fields by the wider community. As above, although private, the land would also be covered by legislation (section 77 of the 1998 School Standards and Framework Act).</p> <p>Page 49 – ref 42 <i>Land west of King Edward Road</i> There is a live application on this site for the erection of 2 dwellings (DC/18/1599).</p> <p>Page 57 – ref 50 <i>Tower Hill (down railway)</i> HDC considers this proposed LGS does not meet the tests as stated in the NPPF.</p>	

NP Paragraph No/ Policy No.	Suggested Change / Comment	Reason for comment
SEA/SA	<p>Thank you for providing a draft of the SEA to the Council for comment. It is clear that a great deal of work has gone into this document and overall it covers the main legislative requirements that are needed. As you will know, the SA/SEA process is an area for legal challenges to Neighbourhood plans. Although we recognise that the SA/SEA should be proportionate, we are seeking to ensure that the assessment of these plans is such that the risk of a successful challenge is minimised. We recognise that SA/SEA is an iterative process, and that the assessment will need to be updated in light of any changes that are made to the plan following this consultation stage.</p> <p>In order to ensure that the SA/SEA covers the necessary criteria set out in legislation, Horsham District Council uses a QA checklist. This is attached – it is recommended that this is used and included as an appendix (1 – see below) to the document to help show where the necessary legal requirements have been covered in the SA report. As a general comment it is suggested statutory wording – e.g. plans and programmes / baseline are used in the report (together with other headings – ‘e.g. policy context):</p> <ol style="list-style-type: none"> 1) Plans and Programmes it would be helpful to add further explanation as to any specific requirements of these documents in relation to the Southwater NP in the main text, such as the need for housing delivery and the general conformity with key strategic policies. 2) Assessment of alternatives and policies – we are pleased to see that this has been covered. The SA/SEA process should help to inform which option is selected and therefore which policies then progress into the plan rather than the other way around. 3) Further commentary is required on the alternatives considered. Legislation requires that ‘reasonable alternatives’ 	

NP Paragraph No/ Policy No.	Suggested Change / Comment	Reason for comment
	<p>be addressed. These should be identified and considered where relevant, as failure to do so can lead to a legal challenge.</p> <p>4) Information within the assessments. Please provide detailed commentary as to why the assessment/conclusion was reached. This will need to be provided. It is also important to ensure that this is applied in a consistent manner between sites. This again is a key area of legal challenge to SEAs, and it will be necessary to update these in this respect with greater detail.</p> <p>5) We are pleased to see that the SEA does consider cumulative and synergistic effects, but there is only very limited coverage as to how the any adverse impacts identified by the SEA are to be addressed (para 7.18).</p>	

APPENDIX 1: SEA REQUIREMENTS

Table 1: SEA Requirements and Where They will be Addressed in SA Report

Requirements	Where covered in Report
a) An outline of the contents, main objectives of the plan or programme, and relationships with other relevant plans and programmes.	
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.	
c) The environmental characteristics of areas likely to be significantly affected.	
d) Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.	
e) The environmental protection objectives, established at international, community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation.	
f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. These effects should include secondary, cumulative, synergistic, short, medium and long-term, permanent and temporary, positive and negative.	
g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.	
h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any	

Requirements	Where covered in Report
difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.	
i) A description of measures envisaged concerning monitoring in accordance with Article 10.	
j) A non-technical summary of the information provided under the above headings.	
<i>The report shall include the information that may reasonably be required taking into account current knowledge and methods of assessment, the contents and level of detail in the plan or programme, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in that process to avoid duplication of the assessment (Art. 5.2).</i>	
<p>Consultation:</p> <ul style="list-style-type: none"> • Authorities with environmental responsibility, when deciding on the scope and level of detail of the information to be included in the environmental report (Art. 5.4). • Authorities with environmental responsibility and the public shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2). • Other EU Member States, where the implementation of the plan or programme is likely to have significant effects on the environment of that country (Art. 7). 	
Taking the environmental report and the results of the consultations into account in decision-making (Art. 8)	
<p>Provision of information on the decision: When the plan or programme is adopted, the public and any countries consulted under Art.7 shall be informed and the following made available to those so informed:</p> <ul style="list-style-type: none"> • The plan or programme as adopted; 	

Requirements	Where covered in Report
<ul style="list-style-type: none">• 5A statement summarising how environmental considerations have been integrated into the plan or programme and how the environmental report pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of consultations entered into pursuant to Article 7 have been taken into account in accordance with Article 8, and the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and• The measures decided concerning monitoring (Art. 9 and 10)	
<hr/> <p>Monitoring of the significant environmental effects of the plan's or programme's implementation (Art. 10)</p> <hr/> <p>Quality assurance: environmental reports should be of a sufficient standard to meet the requirements of the SEA Directive</p> <hr/>	